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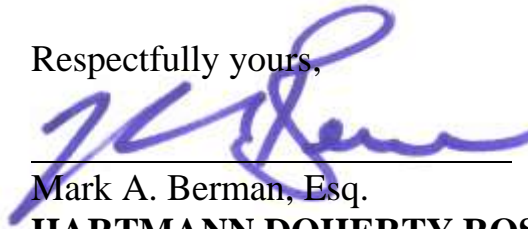
**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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	:	
Plumbers' Local Union No. 690	:	
Health Plan, on behalf of itself, and	:	Civil Action No. 15-0956 (KM)
Delaware Valley Health Care	:	
Coalition,	:	
	:	
<i>Plaintiffs,</i>	:	DEFENDANT DELOITTE LLP'S
	:	<u>NOTICE OF MOTION TO DISMISS</u>
v.	:	
	:	
Sanofi, S.A., <i>et al.</i> ,	:	<i>Oral Argument Requested</i>
	::	
<i>Defendants.</i>	:	
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PLEASE TAKE NOTICE that, on a date and time to be set by the Court, Defendant Deloitte LLP, through its attorneys Hartmann Doherty Rosa Berman & Bulbulia, LLC and Debevoise & Plimpton, LLP, will move before the Honorable Kevin McNulty, U.S.D.J., at the United States District Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey, for entry of an Order dismissing Plaintiffs' Second Amended Class Action Complaint with prejudice, under Federal Rule of Civil Procedure 12; and

PLEASE TAKE FURTHER NOTICE that, in support of this application, Defendant Deloitte will rely upon the accompanying Brief and Certification of Counsel, as well as the Brief in Support of Motion to Dismiss filed by the Sanofi Defendants and any other Defendants, and the proposed form of Order submitted herewith.

Respectfully yours,



Mark A. Berman, Esq.

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- and -

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Dated: September 12, 2016